

August 2, 2012

Comments of Langro, Inc DBA Claremont Heights Postal Center

In reference to Docket MC2012-26

I find the latest arguments by the postal service to offer mailboxes with a street address to be misleading. They are claiming it is not a new product:

“The Service Enhancements introduced at certain Competitive PO Box Service locations do not constitute products.” – Page 1, Attachment A

- The ability to use a Street Address creates a new product – PO Boxes with street addresses.

A product is defined in 39 USC 102(6) as a postal service with a distinct cost or market characteristic for which a rate or rates are, or may reasonably be, applied. PO Box customers must elect to use the Street addressing service, and when doing so will use that new address to portray himself to the public in a very different way.

In Answer to Question 4 of Order 997, the USPS says: “Our competitors emphasize that they accept shipments from all private carriers when they promote their mailbox services. This is clearly an option sought by customers of private mailbox providers.” – Page 8, Attachment A

- Note that the USPS itself says this is an option sought by PMB customers. They make no mention of this being an option sought or requested by PO Box customers. These “enhancements” are clearly meant to target PMB Providers and their customers.

“PMB providers often include, at no additional charge, features similar to the enhancements at issue in this proceeding.” – Page 4, Attachment B

- PMB Providers often include the charges for these additional services in their single PMB rate. In fact, when PMB providers add a new “enhancement” like real-mail notification or parcel received notifications, they will often increase the rate of the box to cover the costs associated with offering that service, or charge customers wishing to use those services an additional fee as we do here in our store.

“The service enhancements at issue do not modify the rates.” – Page 2, Attachment A

- Yet, a portion of the price increase is being used to pay for these services. So, the USPS raised the rates. Then they added enhancements to justify rates. Yet, now they would argue that these enhancements do not modify the rates. It seems more valid to argue that the increased rates are directly linked to the enhancements.

Please take these points in to consideration when making your determination.

Most respectfully,

A handwritten signature in black ink, appearing to read 'Sarah Rohde', with a stylized, cursive script.

Sarah Rohde

President

Langro, Inc dba Claremont heights Postal Center

Established 1986

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